

EXHIBIT 4

From: [Weir, Thomas P.](#)
To: ["David Deal"](#)
Cc: [Kustina, Emily M.](#); [Brown, Judson](#); [Weeks, Paul J.](#)
Subject: RE: Brammer v. Violent Hues
Date: Sunday, March 4, 2018 9:54:00 AM

David,

If something is wrong with the notice, please specify what it is and we will fix it if necessary. If your issue is that the location is not in Alexandria, let us know and we will arrange for deposition space there if you insist. At present, we believe that we served you with a deposition notice that complies with the Federal Rules and Local Rules and expect that you will present your client for the deposition as noticed unless we come to an agreement otherwise.

Tom

Thomas P. Weir

KIRKLAND & ELLIS LLP

655 Fifteenth Street, N.W., Washington, D.C. 20005

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F +1 202 879 5200

tom.weir@kirkland.com

From: David Deal [mailto:david@daviddeal.com]
Sent: Friday, March 2, 2018 11:10 AM
To: Weir, Thomas P. <tom.weir@kirkland.com>
Cc: Kustina, Emily M. <emily.kustina@kirkland.com>; Brown, Judson <jdbrown@kirkland.com>; Weeks, Paul J. <paul.weeks@kirkland.com>
Subject: RE: Brammer v. Violent Hues

Tom,

A few things. First, your Notice of Deposition is defective. Without a proper notice, my client is not obligated to be present and will not do so. When my office receives a proper notice that follows the local rules, my suggestion is we speak by telephone to see if we can work things out before I file a Motion for Protective Order.

Thank you,

On March 2, 2018 at 9:00 AM "Weir, Thomas P." <tom.weir@kirkland.com> wrote:

David,

I can assure you that we are not turning this case into our “own personal litigation practice session”; we are zealously representing our client. If you want to file an objection to the notice to depose your client, you are free to do so. We see no basis for such a motion—we are merely asking to depose the plaintiff, the person who initiated this lawsuit and is seeking money damages from our client. And we seek to do so very close to the courthouse where he filed the case. I’m frankly surprised that you find our routine request to depose our client’s adversary to be so objectionable, but we’re happy to address the issues with the court if that’s your preference.

Tom

Thomas P. Weir

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From: David Deal [<mailto:david@daviddeal.com>]

Sent: Thursday, March 1, 2018 3:07 PM

To: Weir, Thomas P. <tom.weir@kirkland.com>

Cc: Kustina, Emily M. <emily.kustina@kirkland.com>; Brown, Judson <jdbrown@kirkland.com>; Weeks, Paul J. <paul.weeks@kirkland.com>

Subject: Re: Brammer v. Violent Hues

Tom,

We will be filing an objection to your deposition requests. I am afraid you (not your client) have taken the opportunity to turn this case into your own personal litigation practice session.

I will leave it up to you to explain to the court the need to force my client and his wife to travel to Virginia in order to answer a few questions, especially considering we have made an offer of \$1,800.00 to settle the case.

Good luck with your approach.

On March 1, 2018 at 2:33 PM "Weir, Thomas P."
<tom.weir@kirkland.com> wrote:

David,

Attached please find a deposition notice for Mr. Brammer. We also intend to take the deposition of Mr. Brammer's wife; will you accept service on her behalf so that she does not have to be formally served with a deposition subpoena? If not, please have Mr. Brammer let her know that the subpoena is coming so it is not a surprise.

Thanks,

Tom

Thomas P. Weir

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David

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David

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